

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

DANIEL LOVELACE and
HELEN LOVELACE, Individually,
and as Parents of
BRETT LOVELACE, Deceased,

Plaintiffs,

vs.

No. 2:13-cv-02289-JPM-dkv
JURY DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.,
BABU RAO PAIDIPALLI, and
MARK P. CLEMONS,

Defendants.

CERTIFICATE OF GOOD FAITH ON BEHALF OF
DEFENDANTS, PEDIATRIC ANESTHESIOLOGISTS, P.A., AND
BABU RAO PAIDIPALLI, M.D., IN SUPPORT OF
ALLEGATIONS OF FAULT AS TO NON-PARTY

(If a defendant has alleged in an answer or amended answer that a non-party is at fault for the injuries or death of the plaintiff, this form must be completed by the defendant or defendant's counsel making such allegation.)

A. In accordance with T.C.A. Section 29-26-122, I hereby state the following:
(Check item 1 or 2 below and sign your name beneath the item you have checked,
verifying the information you have checked. Failure to check item 1 or 2 and/or not
signing item 1 or 2 will make such allegations of fault of a non-party subject to being
stricken with prejudice.)

X 1. I have consulted with one (1) or more experts, which may include the
defendant filing the Certificate of Good Faith, who have provided a signed
written statement confirming that upon information and belief they:

(A) Are competent under § 29-26-115 to express opinion(s) in the case;

and

(B) Believe, based on the information reviewed concerning the care
and treatment of the plaintiff (Brett Lovelace, deceased) for the

incident(s) at issue, that there is a good faith basis to allege such fault against another consistent with the requirements of § 29-26-115.

s/ David M. Cook

David M. Cook

- 2. I have consulted with one (1) or more medical experts, which may include the defendant filing the Certificate of Good Faith, who have provided a signed written statement confirming that upon information and belief they:
- (A) Are competent under § 29-26-115 to express opinion(s) in the case;
- and
- (B) Believe, based on the information reviewed concerning the care and treatment of the plaintiff (Brett Lovelace, deceased) for the incident(s) at issue, that there is a good faith basis to allege such fault against another consistent with the requirements of § 29-26-115.

B. You MUST complete the information below and sign:

I have been found in violation of T.C.A. Section 29-26-122 -0- prior times. (Insert number of prior violations by you.)

s/David M. Cook

David M. Cook

June 27, 2013

Date

Respectfully submitted,

s/David M. Cook

David M. Cook (BPR #5362)

Albert G. McLean (BPR #5150)

The Hardison Law Firm, P.C.

119 S. Main Street, Suite 800

Memphis, TN 38103-3685

(901) 525-8776

Attorneys for Defendants, Pediatric

Anesthesiologists, P.A. and Babu Rao Paidipalli,

M.D.

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on June 27, 2013, a true and correct copy of the foregoing document was, upon information and belief, forwarded by electronic means through the Court's ECF System, and/or by U. S. Mail, postage prepaid to:

Mark Ledbetter
Halliburton & Ledbetter
254 Court Avenue
Suite 305
Memphis, TN 38103
Attorney for Plaintiffs

J. Kimbrough Johnson
Marcy Dodds Magee
Thomas, Hendrix, Harvey, Johnson &
Mitchell, PLLC
2900 One Commerce Square
Memphis, TN 38103
*Attorneys for Defendant, Mark P.
Clemons, M.D.*

/s/ David M. Cook

David M. Cook